

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

IN RE:	: CASE NO: 15-30975-DSK
	: CHAPTER: 13
	:
SYLVIA JEAN GLOSTER	:
Debtor	:

ANSON STREET LLC,	:
Movant,	:
	: CONTESTED MATTER
vs.	:
	:
SYLVIA JEAN GLOSTER	:
GEORGE W. STEVENSON, Trustee	:
Respondents.	:

OBJECTION TO CONFIRMATION

COMES NOW, Anson Street LLC, its successors or assigns, (hereinafter referred to as “Movant”) and shows the Court that for reasons set out below, Movant objects to the confirmation of the Debtor`s Plan;

1.

Movant filed a Proof of Claim listing arrearages totaling \$6,346.13 and an ongoing payment amount of \$207.54 effective December 1, 2015. The Debtor`s Plan fails to provide adequate protection to Movant relative to a property located at 4335 HUNTERS GLEN STREET, MEMPHIS, TN 38128 (the "Property") in violation of 11 U.S.C. § 362. The Plan fails to list Movant who holds the second mortgage on the aforementioned Property and thus fails to direct treatment of the arrears or determine the disbursing agent for the ongoing payments. Therefore, Movant objects to confirmation of the plan in its current form.

WHEREFORE, Anson Street LLC, its successors or assigns, prays that this Court inquire as to the matters raised herein and deny confirmation of the Debtor`s Plan, or enter such orders and require such further inquiry as may appear appropriate to the Court.

Dated: 1/13/16

/s/ Natalie Brown

Natalie Brown

TN BPR No. 022452

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Attorney for Creditor

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin TN, PLLC certify that on the 13th day of January, 2016, I caused a copy of the Objection to Confirmation to be filed in this proceeding by electronic means and to be served as follows:

The following parties were served by electronic notice:

Jimmy E. McElroy, Esq.
jimmy_3780@hotmail.com

George W. Stevenson
Ch13gws@gmail.com

The following parties were served by standard First-Class U.S. Mail:

Sylvia Jean Gloster
4335 Hunters Glen St.
Memphis, TN 38128

Executed on: 1/13/16
By: /s/ Natalie Brown
Natalie Brown
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